

REMARKS

This amendment is in response to the Official Action mailed September 6, 2005.

In the present paper, Applicants have amended claims 2 and 12. Claims 1-5, 7-15 and 17-26 are presented for the Examiner's consideration in view of the following remarks:

The Present Application

The present application is directed to a call processing center capable of accepting calls from a plurality of disparate telecommunications networks. Specifically, agent availability information is shared among the disparate networks through an Agent Availability Network Control Point (AANCP) that may reside in the call processing center (present spec., p. 6, lines 3-17). The AANCP contains an I/O module that interfaces with each disparate telecommunications network (p. 6, line 18 – p.7, line 1). The inventors have discovered a technique in which the AANCP operates as a Network Control Point for each of the disparate networks, responding to queries regarding agent availability.

In response to a query regarding agent availability, the system of the present invention forwards connection information to the network from which the query originated. In that regard, the AANCP functions as a Network Control Point within that network. The response may include routing information for routing a connection from a caller, through the network to an available agent.

An availability entry in the AANCP may be updated with respect to each of the disparate telecommunications networks (p. 7, lines 1-13), making that information available to those networks.

The Examiner has rejected claims 1-5, 7-15 and 17-26 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,987,116 to Petrunka et al. ("Petrunka ") in view of U.S. Patent No. 5,958,014 to Cave ("Cave").

Discussion

Applicants respectfully assert that, for the reasons stated below, the Examiner has not established a *prima facie* case of obviousness because the combination of Petrunka in view of Cave proposed by the Examiner does not teach every limitation of the claims.

The Cave Patent Does Not Teach Disparate Networks

Cave discloses a system for establishing a connection through a switching network 102 between a computer 100 and a call center server 103. An agent queuing manager 11 receives a customer's request and selects an appropriate live agent 12A-12C. Then, the agent queuing manager establishes a connection between the live agent and the customer.

Cave does not disclose disparate telecommunications networks connected to a call center, as required by claim 1. The connection between computer 100 and the server 103 is shown in FIG. 1 and described in the Cave specification:

FIG. 1 shows the overall operation of a traditional common access communication link, such as the internet, wherein certain computers, such as PC 100, can access a server, such as server 103, which may be located, for example, at a bank. This access can be via a traditional telephone switching network 102 or, as will be seen, can be via the internet. PC 100 uses a digital communications device such as modem 101 for effecting this

access. PC 100 could also become connected to server 103 via the internet as is shown by branches 13 and 14 wherein several different PCs, such as PCs 13A-13C and 14A-14C are connected through an internet service provider and eventually routed via router 104 to server 103. These types of computers and connections are all well known in the art.

Cave, col. 2, line 64 – col. 3, line 10. Nowhere in Cave is there described disparate networks connected to a call center. Instead, in the above general discussion of the connection between the PC 100 and server 103, Cave is describing known techniques for making data connections. The techniques are described in the alternative for connecting computer 100: “This access can be via a traditional telephone switching network 102 or, as will be seen, can be via the internet.” Cave does not suggest connecting more than one disparate network to a call center.

FIG. 1 of Cave clearly shows a single connection to a single switching network 102, and not a plurality of disparate telecommunications networks. Assuming for purposes of this argument that more than one type of connection is described in the paragraph above, there is no suggestion in Cave that more than one described connection be used.

Applicants therefore submit that each of the independent claims 1, 11, 21 and 22 require a call center connected to disparate networks, and those claims they are therefore patentable over the combination of Petrunka and Cave made by the Examiner. Applicants further submit that the remaining claims, which incorporate that limitation by reason of their dependencies, are patentable for at least the same reason.

Claims 2 and 12

Dependent claims 2 and 12, as amended, now require that “the availability entry be[] updated with respect to each of the disparate telecommunications networks.” Applicants respectfully submit that no art of record teaches updating availability entries with respect to disparate telecommunications networks.

In the present invention, agent availability information is shared among the disparate networks through an Agent Availability Network Control Point (AANCP) that may reside in the call processing center (present spec., p. 6, lines 3-17). That is done, in part, by an agent update module 42 that “updates the availability status associated with each agent with respect to, for example, Frame Relay, IP, ATM, X.25, POTS and ISDN services.” (*id.* at 7, lines 1-3). The sharing of agent update information in the disparate networks solves one of the problems to which the present invention is addressed (*id.* at 1, lines 14-16).

No such updating of availability entries with respect to disparate telecommunications networks is disclosed in either Cave or Petrunka. For that additional reason, Applicants assert that claims 2 and 12 are patentable over the cited art.

Conclusion

Applicant therefore respectfully asserts that all the claims in the case are now in condition for allowance, and earnestly request that the Examiner issue a Notice of Allowance.

Should the Examiner have any questions regarding the present case, the Examiner should not hesitate in contacting the undersigned at the number provided below.

Respectfully submitted,

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